

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BEARBOX LLC and AUSTIN STORMS,)
Plaintiffs,)
v.) C.A. No. 21-534-MN-CJB
LANCUM LLC, MICHAEL T. McNAMARA,)
and RAYMOND E. CLINE, JR.)
Defendants.)

**PLAINTIFFS' MOTION TO EXCLUDE
CERTAIN TESTIMONY OF DR. MARK EHSANI**

Plaintiffs, Bearbox LLC and Austin Storms (collectively “Plaintiffs”), move to exclude certain testimony of Dr. Mark Ehsani under Federal Rule of Evidence 702 in view of *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993). Specifically, the Court should exclude Dr. Ehsani’s opinions about fact disputes for which he has no particular qualifications and applies no reliable methodology to reach his conclusions. This includes Dr. Ehsani’s opinions about (1) whether Plaintiff Austin Storms had an expectation of confidentiality in information he shared with the Defendants, and (2) whether the Defendants’ acts prevented Mr. Storms from capitalizing on his ideas.

In further support of this Motion, Plaintiffs submit herewith Plaintiffs’ Opening Brief in Support of Their Motion to Exclude Certain Testimony of Dr. Mark Ehsani and the Declaration of John R. Labbe in Support of Plaintiffs’ Motion to Exclude Certain Testimony of Dr. Mark Ehsani including Exhibits A and B.

Pursuant to D. Del. LR 7.1.1, Plaintiffs have made a reasonable effort to reach agreement with Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline, Jr. (collectively, "Defendants") on the subject matter set forth in this Motion, and have been informed that Defendants oppose the relief sought.

ASHBY & GEDDES

/s/ Andrew C. Mayo

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